codex alimentarius commission

Agenda Item 3b)   **CX/GP 02/4-Add.1**

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON GENERAL PRINCIPLES
Seventeenth Session
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THE APPLICATION OF RISK ANALYSIS IN THE ELABORATION OF CODEX STANDARDS

Government comments

INDIA

REFORMULATED VERSION OF THE PROPOSED RECOMMENDATIONS

This is with reference to Agenda item 3 (b) and Document CX-GPO 2/4 to be discussed in the 17th Session of the CCGP. This is the paper prepared by India related to the application for risk analysis in the elaboration of codex standards.

In the 16th Session of the CCGP India had circulated a CRD which was numbered CX/GP01/4 which tried to remove some of the repetition which had come in the earlier document.

This paper puts these points for discussion in brief.

The primary aim of setting up the Codex Alimentatrius Commission is to develop standards, guidelines and codes so as to protect the health of consumers and facilitate fair trade. This objective can be achieved only when the codex standards are developed within the frame work of the SPS agreement. The main features would, therefore, be:

(a)   Standards should be based on risk analysis exercise so that these can be scientifically justified.

(b)   Any SPS measures, should be transparent and proportionate to the extent of health risk and it should not have any negative trade effects. Thus SPS protection would be of an appropriate level.

In the paper we have briefly discussed certain examples which have been a cause for concern and about the future activities of the Codex with regard to development of standards, guidelines and codes. There are more examples which can be discussed, if necessary. There may be a feeling amongst some members that the views expressed in this paper have already been acknowledged by various Codex Committees and the CAC. India would like to reiterate that execution of these views have not been fully ensured. It is because of this that India proposed setting up of guidelines for consideration of the Committee. In view of a fairly large number of proposals for elaboration of standards and codes, India has made some recommendations in the paper which are proposed for consideration of the committee.

A document on guidelines to be followed for risk assessment by the Codex Committees needs to be prepared by CCGP.

Some of the points which could be considered for inclusion in the document are:

1. The risk assessment exercise should be initiated by an expert committee, such as JECFA, JMPR, or a consultation group, etc. concerned with human health and food safety at the stage, when a new subject is taken up for consideration by a codex committee.

2. The step for collection of data from all the member countries to carry out risk assessment should be made a part of the standard setting procedure. This data should include epidemiological surveillance information and exposure studies. For the sake of convenience, a proforma for providing data could be provided and a time frame could be stipulated for this purpose.

3. The data submitted by member countries should specify the method of sampling followed for collection of samples and also clearly specify the method of estimation and their detection level.

4. The traditional/cultural practices, economic feasibility of the risk management options in developing countries and the need for flexibility in establishment of standards, guidelines and codes should be taken into consideration.

5. Before completion of the risk assessment exercise, the data should be circulated to member countries and an opportunity be given to them to comment.

6. It should be ensured that no proposals are advanced to step 5 without completion of proper risk assessment.

7. For collection of data and attending meetings where risk assessment studies are considered, funds should be made available to developing countries.